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10 Attorneys for Plaintiff
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

No. CR 2:24-84-GW

14 Plaintiff,

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

15 v.

16 PEDRAM MEHRIAN,

17 Defendant.

CURRENT PRETRIAL CONFERENCE DATE:
August 7, 2025

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CURRENT TRIAL DATE:
August 19, 2025

[PROPOSED] PRETRIAL CONFERENCE
DATE:
September 18, 2025

[PROPOSED] TRIAL DATE:
September 30, 2025

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24 Plaintiff United States of America, by and through its counsel
25 of record, the United States Attorney for the Central District of
26 California, Assistant United States Attorney Kedar S. Bhatia and
27 Special Assistant United States Attorney Yervant P. Hagopian, and
28 defendant Pedram Mehrian ("defendant"), both individually and by and

1 through his counsels of record, David L. Menninger and Samuel O.
2 Cross, hereby stipulate as follows:

3 1. The Indictment in this case was filed on February 7, 2024.
4 Defendant first appeared before a judicial officer of the court in
5 which the charges in this case were pending on February 14, 2024.
6 The Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
7 trial commence on or before April 24, 2024.

8 2. On February 14, 2024, the Court set a trial date of March
9 26, 2024. Based on stipulations by the parties, the Court has
10 continued the trial dates to August 27, 2024, November 12, 2024,
11 February 25, 2025, June 24, 2025, and then August 19, 2025 and found
12 the interim period to be excluded in computing the time within which
13 the trial must commence, pursuant to the Speedy Trial Act.

14 3. Defendant is released on bond pending trial. The parties
15 estimate that the trial in this matter will last approximately three
16 to five days.

17 4. By this stipulation, defense moves to continue the pretrial
18 conference and trial dates to September 18, 2025, and September 30,
19 2025, respectively. This is the sixth request for a continuance.

20 5. Defendant requests the continuance based upon the following
21 facts, which the parties believe demonstrate good cause to support
22 the appropriate findings under the Speedy Trial Act:

23 a. Defendant is charged with multiple violations of 18
24 U.S.C. § 1343 (wire fraud). The government has produced to defense
25 counsels over 111,000 pages of discovery, including loan files, bank
26 records, recorded communications, and confidential business and
27 investor materials.

1 b. Defense counsels represent that they will not have the
2 time that they believe is necessary to prepare to try this case on
3 the current trial date due to the following cases for Mr. Menninger:

4 i. *United States v. Rivera-Sanchez*, CR 25-215-DSF,
5 trial 9/23/25, drug trafficking;

6 ii. *United States v. Caraveo-Nava*, CR 25-139-ODW,
7 trial 10/14/25, illegal reentry;

8 iii. *United States v. Rodarte*, CR 25-350-MCS, trial
9 10/21/25, felon in possession of a firearm; and

10 iv. *United States v. Torres*, CR 25-424-PA, trial
11 1/13/2026, conspiracy to impede officer.

12 c. And the following cases for Mr. Cross:

13 i. *United States v. Des Barres*, 2:24-cr-477-TJH,
14 Jury Trial Oct 7, 2025, Status Conference Sept 15, 2025, Enticement,
15 production of child pornography, receipt, possession of animal crush
16 videos;

17 ii. *United States v. Garcia-Garcia*, 5:25-cr-180-PA,
18 Jury Trial Nov. 4, 2025, Status Conference Oct. 27, 2026, 1326, 1-2
19 day trial;

20 iii. *United States v. Nash*, 8:24-cr-00046-JVS, Jury
21 Trial Nov. 25, 2025, Status Conference Nov. 17, 2025, 3-day trial,
22 922(g), 841(b)(1)(A).

23 iv. *United States v. Nelson*, 2:24-cr-00546-HDV, Jury
24 Trial Dec. 2, 2025, SC Nov. 6, 2025; 922(g)x2, 1-2 day trial; and

25 v. *United States v. Sommers*, 2:24-cr-412-JLS, Jury
26 Trial Feb. 3, 2026, Status Conference Jan. 2, 2026, 2-3 day trial,
27 sex trafficking, production/distribution/possession of child
28 pornography.

1 d. In light of the foregoing, counsels for defendant also
2 represent that additional time is necessary to confer with defendant,
3 conduct and complete an independent investigation of the case,
4 conduct and complete additional legal research including for
5 potential pre-trial motions, review the discovery and potential
6 evidence in the case, and prepare for trial in the event that a
7 pretrial resolution does not occur. Defense counsels represent that
8 failure to grant the continuance would deny them reasonable time
9 necessary for effective preparation, taking into account the exercise
10 of due diligence.

11 e. Defendant believes that failure to grant the
12 continuance will deny him continuity of counsel and adequate
13 representation.

14 f. The government does not object to the continuance.

15 g. The requested continuance is not based on congestion
16 of the Court's calendar, lack of diligent preparation on the part of
17 the attorneys for the government or the defense, or failure on the
18 part of the attorneys for the Government to obtain available
19 witnesses.

20 6. For purposes of computing the date under the Speedy Trial
21 Act by which defendant's trial must commence, the parties agree that
22 the time period of August 19, 2025 to September 30, 2025, inclusive,
23 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
24 (h)(7)(B)(i) and (h)(7)(B)(iv) because the delay results from a
25 continuance granted by the Court at defendant's request, without
26 government objection, on the basis of the Court's finding that:
27 (i) the ends of justice served by the continuance outweigh the best
28 interest of the public and defendant in a speedy trial; (ii) failure

1 to grant the continuance would be likely to make a continuation of
2 the proceeding impossible, or result in a miscarriage of justice; and
3 (iii) failure to grant the continuance would unreasonably deny
4 defendant continuity of counsel and would deny defense counsels the
5 reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

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1 7. Nothing in this stipulation shall preclude a finding that
2 other provisions of the Speedy Trial Act dictate that additional time
3 periods be excluded from the period within which trial must commence.
4 Moreover, the same provisions and/or other provisions of the Speedy
5 Trial Act may in the future authorize the exclusion of additional
6 time periods from the period within which trial must commence.

IT IS SO STIPULATED.

Dated: July 23, 2025

Respectfully submitted,

BILAL A. ESSAYLI
United States Attorney

CHRISTINA T. SHAY
Assistant United States Attorney
Chief, Criminal Division

KEDAR S. BHATIA
Assistant United States Attorney

/s/
Yervant P. Hagopian
Special Assistant United States
Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 We are Pedram Mehrian's attorneys. We have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with our client. We have fully informed our client of his Speedy
4 Trial rights. To our knowledge, our client understands those rights
5 and agrees to waive them. We believe that our client's decision to
6 give up the right to be brought to trial earlier than September 30,
7 2025 is an informed and voluntary one.

Del Mar

7/31/2025

9 David Menninger
10 Attorney for Defendant
Pedram Mehrian

Date

12 Samuel Cross
13 Attorney for Defendant
14 Pedram Mehrian

Date

I have read this stipulation and have carefully discussed it with my attorneys. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than September 30, 2025. I understand that I will be ordered to appear in Courtroom 9D of the Federal Courthouse, 350 W. 1st Street, Los Angeles, California on September 18, 2025 at 8:00 a.m. for a pretrial conference and on September 30, 2025 at 8:30 a.m. for trial.



7-31-25

24 Pedram Mehrian
Defendant

Date